

**IN THE WESTERN DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**EVDOKIA NIKOLOVA,
Plaintiff**

VS.

**UNIVERSITY OF TEXAS AT AUSTIN,
Defendant**

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CIVIL ACTION

NO. 1:19-CV-00877-RP

JURY REQUESTED

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND TIME
TO FILE REPLY REGARDING PLAINTIFF’S MOTION FOR JUDGMENT**

TO THE HONORABLE ROBERT PITMAN:

Counsel for Plaintiff Evdokia Nikolova, Ph.D., (“Dr. Nikolova” or “Plaintiff”) respectfully requests an additional 10 days to file a Reply to Defendant University of Texas at Austin’s Response to Plaintiff’s Motion For Judgment (Dkts. #99 and #102) and shows the Court as follows:

1. Plaintiff filed Plaintiff’s Motion For Judgment (Dkt. #99) on April 28, 2022.
2. Defendant requested and was granted an extension of time to file its response, which was filed on Monday, June 20, 2022 (Dkt. #102).
3. Although the undersigned Plaintiff’s counsel, Robert Schmidt, had intended and endeavored to file a timely reply this coming Monday, June 27, 2022, multiple issues arose that necessitate this request for an extension. Plaintiff’s counsel was forced to address several time-consuming, emergency and unexpected professional matters that required immediate action. Additionally, the undersigned has experienced personal medical issues that have interfered with counsel’s ability to work in his normal manner.
4. The undersigned is also scheduled for a much-needed, pre-planned vacation leaving tomorrow, June 25 and returning July 4, 2022.
5. Both Plaintiff’s Motion for Judgment and Defendant’s Response raise issues and

that deserve thorough and appropriate briefing. The additional time will allow Plaintiff's counsel time to provide the Court with briefing that will help the Court address and resolve these issues.

6. Plaintiff's counsel had earnestly worked and hoped to not have to file this motion, does not wish to delay this case or inconvenience the Court in any way, and greatly appreciates the Court's consideration of this extension.

7. As set forth in the below certificate of conference, Plaintiff's counsel conferred with opposing counsel, Ben Dower, who stated that he does not oppose this motion to extend.

PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff's counsel respectfully requests an additional 10 days, until July 7, 2022, to file a Reply to Defendant's Response To Plaintiff's Motion for Judgment, and such other and further relief as the Court determines justice and fairness so require.

Respectfully submitted,

CREWS LAW FIRM, P.C.
701 Brazos, Suite 900
Austin, Texas 78701
(512) 346-7077
(512) 342-0007 (Fax)
schmidt@crewsfirm.com

By: /s/ Robert W. Schmidt
Robert W. Schmidt
State Bar No. 17775429
Joe K. Crews
State Bar No. 05072500

Robert Notzon
The Law Office of Robert Notzon
Texas Bar No. 00797934
1502 West Avenue
Austin, Texas 78701
(512) 474-7563
(512) 852-4788 facsimile

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Defendant's counsel Ben Dower who stated he does not oppose this motion.

/s/ Robert W. Schmidt
Robert W. Schmidt

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2022, this document was served pursuant to Federal Rules of Civil Procedure on counsel for Defendants at the following address:

Benjamin L. Dower
Assistant Attorney General
Office of the Attorney General of Texas
General Litigation Division
P.O. Box 12548
Capitol Station,
Austin, Texas 78711-2548
Fax (512) 320-0667
benjamin.dower@oag.texas.gov

/s/ Robert W. Schmidt
Robert W. Schmidt